

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**MICHAEL COREY JENKINS,  
EDDIE TERRELL PARKER**

**PLAINTIFFS**

**v.**

**CAUSE NO. 3:23-cv-374-DPJ-ASH**

**RANKIN COUNTY, MISSISSIPPI,  
RANKIN CO. SHERIFF BRYAN BAILEY,  
Individually, et al.**

**DEFENDANTS**

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**MOTION FOR SUMMARY JUDGMENT PREMISED ON QUALIFIED IMMUNITY**

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**NOW COMES** Defendant, Sheriff Bryan Bailey, in his individual capacity, by and through counsel, and moves this Court for summary judgment premised on qualified immunity by stating as follows:

1. The training and supervision at the Rankin County Sheriff's Department was not inadequate or constitutionally impermissible, Sheriff Bailey was not deliberately indifferent to any need for additional training and/or supervision, and a causal connection does not exist between any alleged failure to train or supervise and the violation of Plaintiffs' rights.

2. Sheriff Bailey never ratified the misdeeds of the former deputies once he possessed knowledge of the truth.

3. Based on the legal precedent and analysis in his accompanying memorandum of authorities, Sheriff Bailey is entitled to qualified immunity on all claims against him in this civil litigation, and respectfully requests that this grant his instant motion for summary judgment.

4. In support of his instant motion, Sheriff Bailey submits and relies upon the following exhibits:

- a. **Exhibit 1** – Deposition of Sheriff Bryan Bailey;
- b. **Exhibit 2** – Deposition of Dwayne Thornton;
- c. **Exhibit 3** – Excerpts from Deposition of Steve Godfrey;
- d. **Exhibit 4** – Excerpts from Deposition of Eddie Terrell Parker;
- e. **Exhibit 5** – Deposition of Alan Schmidt;
- f. **Exhibit 6** – Affidavit of Richard Lawrence;
- g. **Exhibit 7** – Policies and Procedures;
- h. **Exhibit 8** – Training & Employment Files;
- i. **Exhibit 9** – Supplemental Training;
- j. **Exhibit 10** – Dedmon Use of Force Reports;
- k. **Exhibit 11** – Complaints & Discipline;
- l. **Exhibit 12** – Jenkins / Parker Incident Reports & *Garrity* Warnings;
- m. **Exhibit 13** – Summary Data; and
- n. **Exhibit 14** – Schmidt Incident Report & Booking.

**WHEREFORE, PREMISES CONSIDERED**, Sheriff Bryan Bailey submits that he is entitled to qualified immunity and respectfully requests that this Court grant him summary judgment on any and all claims against him.

**RESPECTFULLY SUBMITTED**, this 17<sup>th</sup> day of March, 2025.

**SHERIFF BRYAN BAILEY, IN HIS INDIVIDUAL  
CAPACITY - DEFENDANT**

**BY:** /s/ Jason E. Dare  
**JASON E. DARE**

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